

UNITED STATES OF AMERICA
DISTRICT OF MASSACHUSETTS

CRIMINAL NO.: 04-10336

UNITED STATES OF AMERICA
v.
SANTIAGO ET AL.

**DEFENDANT JOSE TORRADO'S MOTION FOR MODIFICATION OF HIS
CONDITIONS OF RELEASE FOR CHRISTMAS [ASSENTED]**

Now comes the defendant, JOSE TORRADO and renews his motion for modification of his release conditions by removing the electronic monitoring on Saturday, December 24, 2005 (Christmas Eve) and on Sunday, December 25, 2005 (Christmas Day) until 11:00 p.m. so that he may be with his wife and children . Mr. Torrado also asks this Court to release him from the electronic monitoring condition until 11:00 p.m. on Saturday, December 31, 2005 (New Year's Eve) and until 9:00 p.m. on Sunday, January 1, 2006 (New Year's Day) so that he may be with his family.

Mr. Torrado has been on the electronic bracelet for more than one year and has been one hundred percent compliant with all his conditions. William Bloomer, the Assistant United States Attorney has no opposition to this motion.

Respectfully submitted,
JOSE TORRADO
By his attorney,

Assented by,

/s/ Lenore Glaser, Esq. _____
Lenore Glaser, Esq.
25 Kingston St. 6th Floor
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BBO # 194220

William Bloomer, AUSA
United States Attorney
John Joseph Moakley U.S. Courthouse
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Dated: December 19, 2005